

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

ROBERT MENENDEZ, NADINE MENENDEZ, WAEL
HANA, JOSE URIBE, and, FRED DAIBES,

Defendants.

Case No. 1:23-cr-00490-SHS

DECLARATION IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL

I, Roberto Finzi, hereby declare pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”) and a member in good standing of the bar of the State of New York and this Court. I respectfully submit this declaration pursuant to Local Criminal Rule 1.1(b) and Local Civil Rule 1.4 in support of the accompanying Motion of Roberto Finzi and Richard Tarlowe to Withdraw as Counsel for Defendant Fred Daibes in this matter.

2. On October 3, 2023, Richard Tarlowe and I each filed a Notice of Appearance on behalf of Defendant Fred Daibes. ECF Nos. 42, 43.

3. On November 13, 2023, Timothy M. Donohue, of the law firm of Arleo & Donohue, LLC, filed a Motion for Admission *Pro Hac Vice* on behalf of Mr. Daibes. ECF No. 86. The Court granted this motion on November 14, 2023.

4. Mr. Donohue will continue as counsel for Mr. Daibes.

5. This withdrawal will not affect this action in any way, including the posture of the case and the calendar; nor will it prejudice Mr. Daibes or the government.

6. Mr. Daibes has consented to this withdrawal.

7. Paul, Weiss is not asserting a retaining or charging lien.

8. Pursuant to Local Civil Rule 1.4, a copy of this application is being served upon Mr. Daibes and all other parties.

9. Accordingly, I respectfully request that the Court grant the Motion to Withdraw.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
December 6, 2023

By: 
Roberto Finzi